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Attorneys for Third-Party Defendants International Alliance of
Theatrical Stage Employees and Moving Picture Machine
Operators of the United States and Canada, Local 720, Marielle
“Apple” Thorne, and Phil Jaynes

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION-INTERNTIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; et al.,

Plaintiffs,

v.

BIG FIN 720, LLC; et al.,

Defendants.

BIG FIN 720, LLC; et al.,

Counterclaim-Plaintiffs,

v.

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION-INTERNTIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE

No. 2:23-cv-00149-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR THIRD-PARTY
DEFENDANTS TO ANSWER THIRD-
PARTY COMPLAINT**

(First Request)

1 MACHINE OPERATORS OF THE UNITED
2 STATES AND CANADA, LOCAL 720,
PENSION TRUST; et al.,

3 Counterclaim-Defendants.

4 BIG FIN 720, LLC; et al.,

5 Third-Party Plaintiffs,

6 v.

7 INTERNATIONAL ALLIANCE OF
8 THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
9 OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720; et al.,

10 Third-Party Defendants.

11 IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel of record for
12 Third-Party Plaintiffs and Third-Party Defendants that Third-Party Defendants International
13 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United
14 States and Canada, Local 720 (“Union”) and Marielle “Apple” Thorne and Phil Jaynes in their
15 capacities as officers of the Union¹ will have up to and including March 15, 2024, to answer the
16 Third-Party Complaint (ECF No. 9). The original deadline is March 1, 2024, under Federal Rule
17 of Civil Procedure 12(a)(4)(A), in light of the Court denying Third-Party Defendants’ Motion to
18 Dismiss the Third-Party Complaint on February 16, 2024. *See* ECF No. 29.

19 The Plaintiffs/Counterclaim-Defendants Trusts and Trustees, the Third-Party Defendants
20 Thorne and Jaynes in their capacities as Trustees of the Trusts, and the Defendants/Counterclaim-
21 Defendants by their respective undersigned counsel do not object to the foregoing stipulation.

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27 ¹ According to the record, it does not appear that Third-Party Defendant Ronald Poveromo has been
28 served with process. As such, he is not yet joined as a party to this case as a named Third-Party
Defendant. Undersigned counsel for Third-Party Defendants Union and Union officers are not
presently authorized to represent Mr. Poveromo.

This is the first request for an extension of this deadline. The request is made in good faith and not for the purpose of delay. Additional time is needed to enable the Union to address internal Union process matters before answering the Third-Party Complaint.

DATED: March 1, 2014

THE URBAN LAW FIRM

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Union, Marielle "Apple" Thorne, and
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED:

3/4/2024

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